From: <u>Amanda Masters</u>

To: <u>Mathew Harrington</u>; <u>Amy K. Alexander</u>

Cc: <u>Laura Smith</u>; <u>Sarah Armon</u>; <u>Anna Armitage</u>; <u>Katie Marchenko</u>; <u>Darren Feider</u>

Subject: RE: Teixeira v. Mozilla, et al. No 24-cv-01032-RAJ

Date: Tuesday, September 3, 2024 3:11:55 PM

Attachments: <u>image001.jpg</u>

Hi Mat.

As you are most likely aware, the collection of data and then review of data takes quite a bit of time and your discovery request is very broad. Our client was out of the office for some time, which makes gathering information and data difficult. In addition, Darren has been out of the office for several weeks, I have been involved in heavy litigation in other matters for the past several weeks while dealing with personal matters, and I will be out of the office for almost two weeks in September. Hopefully, you and your client can understand and appreciate this. Given that the trial date is over a year from now - in October 2025 - we have plenty of time to engage in discovery and would appreciate the professional courtesy that we would be happy to extend to you in the future, as necessary.

Furthermore, if you would like hit reports, please provide us with search terms.

Again, thank you for your professional courtesy.

Thank you.

Logo

Best regards,

?

Amanda V. Masters





E: amasters@sbj.law | Sbj.laW

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

This email is confidential and may be privileged and protected from disclosure. Please notify me at amasters@sbi.law if you have received this email in error.

From: Mathew Harrington < Mathew. Harrington@stokeslaw.com>

Sent: Tuesday, September 3, 2024 2:38 PM

To: Amanda Masters <amasters@sbj.law>; Amy K. Alexander <Amy.Alexander@stokeslaw.com> **Cc:** Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Katie Marchenko <kmarchenko@sbj.law>; Darren Feider <dfeider@sbj.law>

Subject: RE: Teixeira v. Mozilla, et al. No 24-cv-01032-RAJ

[WARNING: From EXTERNAL Sender]

Amanda,

We will take this request to our client. In the usual case I'm all in favor of professional courtesies and extensions. But in these circumstances I won't be surprised if our client is leery of a request for delay.

Specifically, so far we have only issued one Interrogatory and one RFP to Mozilla Foundation. The

Foundation has had this 1 Rog and 1 RFP for 39 days.

It seems unusual that on the afternoon that responses are due, the Foundation is asking for another 42 days. I'm not clear why this couldn't have and shouldn't have been raised earlier. Can you give us some additional detail about why this request is being made at the last minute, and why 6 weeks is needed, so that we can give our client the full picture for your request for an extension?

Another reason this is surprising is that I also recall that during our first Rule 26(f) conference Darren raised a concern about our RFP being potentially overbroad. Amy invited him to provide hit reports to us, and we never heard more after that.

Regards,

Mat

Mathew L. Harrington

Attorney - Shareholder | Stokes Lawrence, P.S.

Mathew.Harrington@stokeslaw.com | direct: 206.892.2135 | Bio

This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: Amanda Masters amasters@sbj.law>
Sent: Tuesday, September 3, 2024 1:10 PM

To: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Laura Smith

 $<\!\!\underline{\text{Laura.Smith@stokeslaw.com}}\!\!>; Sarah Armon <\!\!\underline{\text{sarah.armon@stokeslaw.com}}\!\!>; Anna Armitage$

<<u>Anna.Armitage@stokeslaw.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; Darren Feider

<<u>dfeider@sbj.law</u>>

Subject: RE: Teixeira v. Mozilla, et al. No 24-cv-01032-RAJ

Hi Amy,

We are requesting a six-week extension to October 15, 2024 respond to Plaintiff's discovery requests, as many people on our team and our client's have been on vacation or have upcoming vacation.

Thank you for your understanding.

Best regards,

Amanda V. Masters



Amanda V. Masters, Attorney Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 450-3385 | F: (425) 453-9005

E: amasters@sbj.law | sbj.law

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

This email is confidential and may be privileged and protected from disclosure. Please notify me at amasters@sbi.law if you have received this email in error.

From: Anna Armitage < <u>Anna.Armitage@stokeslaw.com</u>>

Sent: Friday, July 26, 2024 3:28 PM

To: Darren Feider dfeider@sbj.law; Amanda Masters amasters@sbj.law; Todaro, Anthony <a href="mailto:<a href="m

Cc: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>; Mathew Harrington

<<u>Mathew.Harrington@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <sarah.armon@stokeslaw.com>

Subject: Teixeira v. Mozilla, et al. No 24-cv-01032-RAJ

[WARNING: From EXTERNAL Sender]

Good afternoon, Counsel,

Please find attached the following documents:

- 1. Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant Winifred Mitchell Baker.
- 2. Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant Dani Chehak.
- 3. Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant Laura Chambers.
- 4. Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant Mozilla Foundation.
- 5. Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant Mozilla Corp.

Thank you,

Anna Armitage

Practice Assistant

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

direct: 206.812.7475

<u>Anna.Armitage@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: <u>Cates, Alexandria</u>
To: <u>Amy K. Alexander</u>

Cc: Maricarmen Perez-Vargas; Mathew Harrington; Sarah Armon; Anna Armitage; Laura Smith; Todaro, Anthony

Subject: RE: Teixeira v. Mozilla: Defendants" Discovery Date: Friday, August 30, 2024 11:43:38 AM

Attachments: <u>image001.png</u>

Hi Amy,

We will be producing documents with our responses. Frankly, I'm a bit surprised at the unwillingness to provide a relatively-standard two-week extension, particularly in light of the upcoming holiday, but we will abide by what you have outlined below.

-Alex

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289 alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Friday, August 30, 2024 11:19 AM

To: Cates, Alexandria < Alexandria. Cates@us.dlapiper.com>

Cc: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>

Subject: RE: Teixeira v. Mozilla: Defendants' Discovery

A EXTERNAL MESSAGE

Hello Alex,

By September 3, Defendants will have had 39 days with Plaintiff's discovery requests, which we believe is more than sufficient to respond. Further, as we learned today, Defendants had time in August to collaborate on terminating Mr. Teixeira. We will agree to a one week extension, to September 10, provided you let us know *today* whether Mozilla will be producing documents on September 10.

Sincerely,

Amy Kangas Alexander (she/her)

Shareholder | Stokes Lawrence, P.S.

Seattle, Washington | (206) 892-2161 | Amy.Alexander@stokeslaw.com

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From: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>

Sent: Thursday, August 29, 2024 12:59 PM

To: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Cc: Maricarmen Perez-Vargas < <u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Sarah Armon < <u>sarah.armon@stokeslaw.com</u>>; Anna Armitage@stokeslaw.com>; Laura Smith < <u>Laura.Smith@stokeslaw.com</u>>; Todaro,

Anthony < <u>Anthony.Todaro@us.dlapiper.com</u>> **Subject:** Teixeira v. Mozilla: Defendants' Discovery

Hi Amy,

As you know, Defendants' discovery responses are due on Tuesday, September 3rd. May we have a 2-week extension until Tuesday, September 17th? Mozilla had a week-long company-wide conference in Europe two weeks ago, so that delayed some information-gathering for us.

We appreciate the professional courtesy.

Thank you,

Alex

Alex Cates

Associate

T +1 206 839 4893

F +1 206 494 1797

M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com



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Case 2:24-cv-01032-RAJ Document 54-1 Filed 05/12/25 Page 8 of 61

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From: <u>Cates, Alexandria</u>
To: <u>Amy K. Alexander</u>

Cc: Mathew Harrington; Maricarmen Perez-Vargas; Anna Armitage; Charlotte Edwards; Laura Smith; Sarah Armon;

Bittle, Jacey, McFadden, Robert, Todaro, Anthony

Subject:RE: Mozilla/Teixeira - discovery responsesDate:Wednesday, September 25, 2024 2:58:03 PM

Hello Amy,

The ESI agreement specifically states that the information you are requesting below be provided within 30 days of the order. The ESI order was entered on September 16th. We will follow the order and get you the information that you are requesting within 30 days, or not later than October 16th. Given the number of individuals implicated in this case and amount of data that we are still in the process of collecting, we cannot give you all of the information you demand by tomorrow. To date, we have collected more than 750,000 emails, slack messages, and documents. We are still in the process of collecting more. Given the immense amounts of data that we have to collect and review in order to respond to your requests, this is going to take us some time.

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289 alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Tuesday, September 24, 2024 9:49 AM

To: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Todaro, Anthony

<a href="mailto: Anthony.Todaro@us.dlapiper.com

Cc: Mathew Harrington < Mathew. Harrington@stokeslaw.com>; Maricarmen Perez-Vargas

<Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>;

Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith

<Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey

<Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>

Subject: Mozilla/Teixeira - discovery responses

A EXTERNAL MESSAGE

Hello Alex and Anthony,

I'm writing with some initial concerns about Defendants' responses to Plaintiff's first set of requests for production. Specifically, on RFP 3-5, Mozilla Corporation states that it will produce communications that "contain search terms agreed to by Plaintiff and Defendant." The same is true

for RFP 1 to Ms. Chehak, Ms. Baker, and Ms. Chambers. These responses do not comply with the ESI Protocol, which was negotiated and agreed to nearly contemporaneously with Defendants' responses. Under our ESI Protocol, the producing party must first disclose data sources, including custodians, search terms and queries, file type and date restrictions, and other methodology used to locate responsive ESI and discoverable information, which would include the extent to which Defendants have engaged third party vendors to locate responsive documents. Only after this disclosure might the parties meet and confer about agreed search terms.

We served discovery requests nearly two months ago. It appears that Defendants have not even begun the collection of ESI, and are improperly refusing to do so until Plaintiff provides search terms. This is contrary to the ESI Protocol. We ask that you comply with the ESI Protocol and disclose required initial information no later than Friday, September 27. Please note that Defendants are obligated not only to provide documents found via search terms, but also to locate and produce documents generally responsive to our requests, independent of search terms. At this time, MoCo has produced less than 20 pages of documents in response to our requests, and the individual defendants have produced none. When you respond with the required ESI information, please also advise when Defendants will produce additional documents.

Sincerely,

Amy Kangas Alexander (she/her)

Shareholder | Stokes Lawrence, P.S.

Seattle, Washington | (206) 892-2161 | Amv.Alexander@stokeslaw.com

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From: <u>Amanda Masters</u>

To: <u>Mathew Harrington</u>; <u>Amy K. Alexander</u>

Cc: Maricarmen Perez-Vargas; Anna Armitage; Charlotte Edwards; Laura Smith; Sarah Armon; Darren Feider; Katie

Marchenko; Elaina Pruzinsky

Subject: RE: Mozilla Foundation/Teixeira - discovery responses

Date: Thursday, October 31, 2024 1:39:43 PM

Attachments: <u>image001.jpg</u>

Mozilla Foundation's ESI disclosures are as follows:

Custodians

- Mark Surman
 - Mozilla Foundation email account
 - Slack
 - Google Drive
- Angela Plohman
 - Mozilla Foundation email account
 - Slack
 - o Google Drive

Non-Custodial Data Sources

- Box
 - Board Meeting Agendas and Minutes
 - Relevant policies and procedures

Third-Party Data Sources

None

Inaccessible Data

 Slack messages were set to delete after 180 days so there may be a possibility that not all Slack messages will be recoverable.

Best regards,

Amanda V. Masters



Amanda V. Masters, Attorney Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 450-3385 | F: (425) 453-9005

E: amasters@sbj.law | Sbj.laW

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

This email is confidential and may be privileged and protected from disclosure. Please notify me at amasters@sbi.law if you have received this email in error.

From: Mathew Harrington < Mathew. Harrington@stokeslaw.com>

Sent: Tuesday, October 29, 2024 1:18 PM

To: Amy K. Alexander <Amy.Alexander@stokeslaw.com>; Amanda Masters <amasters@sbj.law>; Darren Feider <dfeider@sbj.law>

Cc: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>

Subject: RE: Mozilla Foundation/Teixeira - discovery responses

[WARNING: From EXTERNAL Sender]

Good afternoon,

We are writing regarding Mozilla Foundation's non-compliance with Section B of the parties' ESI Agreement (Dkt. 20). Pursuant to Section B, on October 16, 2024, Mozilla Foundation was required to disclose 1) list of custodians most likely to have discoverable ESI, 2) a list of non-custodial data sources, 3) a list of third-party data sources, and 4) a list of any data sources that contain inaccessible data.

We have not yet received Mozilla Foundation's ESI disclosures or any information from counsel as to why we have not yet received the required information. Please send the disclosures as soon as possible.

Regards,

Mat

Mathew L. Harrington

Attorney - Shareholder | Stokes Lawrence, P.S.

Mathew.Harrington@stokeslaw.com | direct: 206.892.2135 | Bio

This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: Amy K. Alexander <<u>Amy.Alexander@stokeslaw.com</u>>

Sent: Tuesday, September 24, 2024 4:38 PM

To: Amanda Masters ; dfeider@sbj.law

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas

<<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>;

Charlotte Edwards < charlotte.edwards@stokeslaw.com>; Laura Smith

<<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>

Subject: Mozilla Foundation/Teixeira - discovery responses

Hi Amanda and Darren,

I'm writing with some initial concerns about Mozilla Foundation's compliance with the ESI Protocol in this matter. It's unclear whether the Foundation has even begun collecting ESI, because under our Protocol, the producing party must first disclose data sources, including custodians, search terms and queries, file type and date restrictions, and other methodology used to locate responsive ESI and discoverable information. This would include the extent to which Defendants are engaging third party vendors to locate responsive documents, or whether the Foundation is continuing to rely solely on Board Members' representations regarding the existence of responsive items on the personal devices and email accounts used for Foundation matters, as you stated at the 26(f) conferences.

We served discovery requests nearly two months ago. Because it has not disclosed search terms in compliance with the ESI Protocol, it appears that the Foundation has not even begun the collection of ESI. We ask that you comply with the ESI Protocol and disclose required initial information no later than Friday, September 27. Please note that Defendants are obligated not only to provide documents found via search terms, but also to locate and produce documents generally responsive to our requests, independent of search terms. At this time, the Foundation has produced 13 pages of documents in response to our requests. When you respond with the required ESI information, please also advise when the Foundation will produce additional documents. Sincerely,

Amy Kangas Alexander (she/her)

Shareholder | Stokes Lawrence, P.S.

Seattle, Washington | (206) 892-2161 | Amy.Alexander@stokeslaw.com

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This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: <u>Cates, Alexandria</u>
To: <u>Maricarmen Perez-Vargas</u>

Cc: Mathew Harrington; Anna Armitage; Charlotte Edwards; Laura Smith; Sarah Armon; Bittle, Jacey; McFadden,

Robert, Todaro, Anthony, Amy K. Alexander

Subject:RE: Mozilla/Teixeira - discovery responsesDate:Thursday, December 19, 2024 3:58:31 PMAttachments:2024.12.19 - Mozilla STR Results.xlsx

Hi Maricarmen,

Please see the attached STR report. Note there are two tabs.

Regarding the term "Steve* AND Teixeira" – we understood that the request was to only search the Slack data and the personal email accounts. The chart that you sent over specifically only lists Slack and personal email accounts under "Sources" for that specific search term – whereas, for all other terms, you've requested ALL. Please clarify.

Thank you,

Alex

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Maricarmen Perez-Vargas < Maricarmen. Perez-Vargas @ stokeslaw.com >

Sent: Monday, December 16, 2024 8:23 AM

To: Cates, Alexandria < Alexandria. Cates@us.dlapiper.com>

Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Amy K. Alexander <Amy.Alexander@stokeslaw.com>

Subject: RE: Mozilla/Teixeira - discovery responses

A EXTERNAL MESSAGE

Thank you for your response. Would you please provide a search term report that includes the total number of documents with hits, total number of documents with hits including family, and total number of documents with unique hits? Please also be sure to include the total documents in your

dataset.

Can you please also clarify Mozilla's response to the term "Steve* AND Teixiera"? The request was to search ALL sources (which includes personal and Mozilla email/productivity suite, Google Drive (or other local or cloud based file storage), cell phone storage including text messaging) and your response was that you would search the custodians' personal email accounts. Does this mean you won't search the other sources?

Regards,

Maricarmen Perez-Vargas

Attorney

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2125 | Office: 206.626.6000

Maricarmen.Perez-Vargas@stokeslaw.com | stokeslaw.com

This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>

Sent: Friday, December 13, 2024 4:48 PM

To: Maricarmen Perez-Vargas < <u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Anna Armitage

<<u>Anna.Armitage@stokeslaw.com</u>>; Charlotte Edwards <<u>charlotte.edwards@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; Amy K. Alexander <<u>Amy.Alexander@stokeslaw.com</u>>

Subject: RE: Mozilla/Teixeira - discovery responses

Hi Maricarmen,

Thank you for your email and apologies for our delay, but we have been diligently processing the terms. Our response to your proposals is attached to this chart. For the most part, I think we can come to an agreement on most of these terms if you can limit them a bit. The main reason we are pushing back on most of the terms is because they hit on 500+ documents (and more than half of them hit on 1000+). For these terms, limiting the search to be "within" an amount of terms rather than using the connecter "AND" will likely help narrow the searches down.

Have a nice weekend, Alex

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289 alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Maricarmen Perez-Vargas < <u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>

Sent: Wednesday, December 11, 2024 10:12 AM

To: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Amy K. Alexander

<<u>Amv.Alexander@stokeslaw.com</u>>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Anna Armitage

<<u>Anna.Armitage@stokeslaw.com</u>>; Charlotte Edwards <<u>charlotte.edwards@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>

Subject: RE: Mozilla/Teixeira - discovery responses

A EXTERNAL MESSAGE

Alex,

Since our e-mail from a month ago below, we have not heard anything from Mozilla Corporation in response to our proposed changes to Mozilla Corporation's search terms for its ESI. Per our ESI agreement, the parties are required to engage in a meet and confer process to come to agreement regarding search terms and search methodology. Because we have not heard anything from Mozilla Corporation in response to our proposed changes to Mozilla Corporation's initial proposed search terms, and there has been no request for further discussion or a meet and confer, we assume Mozilla Corporation accepts our proposed changes and has begun the process of applying them to its ESI to identify responsive information.

Regards,

Maricarmen Perez-Vargas (she/her)

Attorney, AWI-CH

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

direct: 206-892-2125

<u>Maricarmen.Perez-Vargas@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Maricarmen Perez-Vargas

Sent: Tuesday, November 12, 2024 10:19 AM

To: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>; Amy K. Alexander

<a href="mailto:amy.Alexander@stokeslaw.com

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Anna Armitage

<<u>Anna.Armitage@stokeslaw.com</u>>; Charlotte Edwards <<u>charlotte.edwards@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Todaro,

Anthony < <u>Anthony.Todaro@us.dlapiper.com</u>>

Subject: RE: Mozilla/Teixeira - discovery responses

Alex.

It's a pleasure to meet you. We request that you add the additional attached search terms to the terms you suggested below, as well as some edits to your proposed terms, to ensure all potentially relevant ESI is captured.

Regards,

Maricarmen

Maricarmen Perez-Vargas (she/her)

Attorney, AWI-CH

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

direct: 206-892-2125

Maricarmen.Perez-Vargas@stokeslaw.com | stokeslaw.com

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From: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>

Sent: Tuesday, October 15, 2024 8:16 PM

To: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Cc: Mathew Harrington < Mathew. Harrington@stokeslaw.com >; Maricarmen Perez-Vargas

< <u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Anna Armitage < <u>Anna.Armitage@stokeslaw.com</u>>;

Charlotte Edwards < charlotte.edwards@stokeslaw.com>; Laura Smith

<<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey

<<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Todaro,

Anthony < Anthony. Todaro@us.dlapiper.com >

Subject: RE: Mozilla/Teixeira - discovery responses

Hi Amy,

Per the terms of the ESI agreement, see below for our disclosures.

Custodians

- 1. Steve Texeira, Plaintiff
 - a. Emails
 - b. Google Drive
 - c. Box folder
- 2. Mitchell Baker, Defendant, Former Chief Executive Officer of Mozilla Corporation, Inc.
 - a. Emails
 - b. Google Drive
 - c. Cellphone
- 3. Laura Chambers, Defendant -Current Chief Executive Officer of Mozilla Corporation, Inc.
 - a. Emails (beginning 2/6/24)
 - b. Google Drive
 - c. Cellphones (2)
- 4. Dani Chehak, Defendant Current Chief People Officer of Mozilla Corporation, Inc.
 - a. Emails
 - b. Google Drive
 - c. Cellphone

Non-Custodian Data Sources

1. Slack - given the way manner in which Slack was stored during the relevant time period, Slack data is not organized by custodian. Instead, we have a snapshot of Slack data taken on May 15, 2024. Mozilla's Slack retention policy is 6 months, so the snapshot captures all Slack data 6 months prior to the date of the snapshot.

Third party data sources

1. Cell phone accounts for Mitchell, Laura, and Dani, as mentioned above. We are currently in the process of imaging Laura, Mitchell, and Dani's cellphones.

Inaccessible Data

1. As mentioned above, Slack data is only retained for 6 months pursuant to Company policy.

Search Methodology

- 1. In response to your RFPS, we propose to search the above-listed custodial email and google drive accounts from August 1, 2022 through the May 18, 2024, as well as all Slack data, that mention the following terms for documents:
 - a. Promot* w/3 (President or CEO))
 - b. CEO w/10 President
 - C. CEO w/3 transition
 - d. CEO w/5 Steve
 - e. Potential w/4 succession
 - f. Replac* w/5 CEO
 - g. Succession /4 plan*

- h. "SVP New Products"
- i. "SVP Technology"
- j. Feedback and Steve
- k. "Performance Review" and Steve
- l. Steve w/20 performance

Thank you, Alex

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Cates, Alexandria

Sent: Wednesday, September 25, 2024 2:58 PM

To: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas

<Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>;

Charlotte Edwards < charlotte.edwards@stokeslaw.com; Laura Smith

<<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey

<<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Todaro,

Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>

Subject: RE: Mozilla/Teixeira - discovery responses

Hello Amy,

The ESI agreement specifically states that the information you are requesting below be provided within 30 days of the order. The ESI order was entered on September 16th. We will follow the order and get you the information that you are requesting within 30 days, or not later than October 16th. Given the number of individuals implicated in this case and amount of data that we are still in the process of collecting, we cannot give you all of the information you demand by tomorrow. To date, we have collected more than 750,000 emails, slack messages, and documents. We are still in the process of collecting more. Given the immense amounts of data that we have to collect and review in order to respond to your requests, this is going to take us some time.

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289 alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Sent: Tuesday, September 24, 2024 9:49 AM

To: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>; Todaro, Anthony

Anthony.Todaro@us.dlapiper.com

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas

<<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>;

Charlotte Edwards < charlotte.edwards@stokeslaw.com; Laura Smith

<<u>Laura.Smith@stokeslaw.com</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Bittle, Jacey

<<u>Jacey.Bittle@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>

Subject: Mozilla/Teixeira - discovery responses

EXTERNAL MESSAGE

Hello Alex and Anthony,

I'm writing with some initial concerns about Defendants' responses to Plaintiff's first set of requests for production. Specifically, on RFP 3-5, Mozilla Corporation states that it will produce communications that "contain search terms agreed to by Plaintiff and Defendant." The same is true for RFP 1 to Ms. Chehak, Ms. Baker, and Ms. Chambers. These responses do not comply with the ESI Protocol, which was negotiated and agreed to nearly contemporaneously with Defendants' responses. Under our ESI Protocol, the producing party must first disclose data sources, including custodians, search terms and queries, file type and date restrictions, and other methodology used to locate responsive ESI and discoverable information, which would include the extent to which Defendants have engaged third party vendors to locate responsive documents. Only after this disclosure might the parties meet and confer about agreed search terms.

We served discovery requests nearly two months ago. It appears that Defendants have not even begun the collection of ESI, and are improperly refusing to do so until Plaintiff provides search terms. This is contrary to the ESI Protocol. We ask that you comply with the ESI Protocol and disclose required initial information no later than Friday, September 27. Please note that Defendants are obligated not only to provide documents found via search terms, but also to locate and produce documents generally responsive to our requests, independent of search terms. At this time, MoCo has produced less than 20 pages of documents in response to our requests, and the individual defendants have produced none. When you respond with the required ESI information, please also advise when Defendants will produce additional documents.

Sincerely,

Amy Kangas Alexander (she/her)

Shareholder | Stokes Lawrence, P.S.

Seattle, Washington | (206) 892-2161 | Amv.Alexander@stokeslaw.com

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The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. To contact us directly, send to postmaster@dlapiper.com. Thank you.

THE HONORABLE RICHARD A. JONES 1 2 3 4 5 6 IN THE UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 STEVE TEIXEIRA, 9 Plaintiff, 10 v. 11 Case No. 2:24-cv-1032- RAJ MOZILLA CORPORATION, a.k.a. M.F. Technologies, a California corporation; 12 DEFENDANT MOZILLA FOUNDATION MOZILLA FOUNDATION, a California ANSWERS AND OBJECTIONS TO public benefit corporation; LAURA PLAINTIFF'S FIRST SET OF 13 CHAMBERS and her marital community; INTERROGATORIES AND REOUESTS WINIFRED MITCHELL BAKER and her FOR PRODUCTION OF DOCUMENTS 14 marital community; and DANI CHEHAK and 15 her marital community, Defendants. 16 17 TO: Plaintiff Steve Teixeira 18 AND TO: Amy Alexander and Mathew Harrington, Attorneys for Plaintiff 19 Pursuant to Rules of 26, 33 and 34 the Federal Rules of Civil Procedure, Defendant Mozilla 20 Foundation ("Mozilla Foundation") serves the following answers and objections to Plaintiff Steve 21 Teixeria's first set of interrogatories and requests for production of documents. The answers below 22 are based upon Mozilla Foundation's investigation to date. 23 24 DEFENDANT MOZILLA FOUNDATION ANSWERS AND OBJECTIONS SERRIS BUSTO JAMES 15375 SE 30th Pl., Suite 310 TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS

FOR PRODUCTION OF DOCUMENTS - 1 Teixeira v. Mozilla Corporation, et al. - Case No. 2:24-cv-1032- RAJ

Bellevue, Washington 98007 Tel: 425-454-4233 - Fax: 425-453-9005 By answering these interrogatories and requests, Mozilla Foundation is not waiving its

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these responses.

General Objections to All Interrogatories and Requests for Production

Mozilla Foundation objects to every interrogatory and request for the following reasons:

- 1. Mozilla Foundation objects to the "Definitions and Instructions" to the extent that they purport to impose an obligation to which Mozilla Foundation has not agreed, and that is neither imposed nor authorized by the applicable rules.
- 2. Mozilla Foundation objects to each interrogatory and request to the extent that, by its breadth, encompasses information and items that are protected by the attorney-client privilege, the work-product doctrine, consulting expert, or any other applicable privilege. To the extent that any privileged information is included among the information and items produced below, that inclusion is inadvertent because Mozilla Foundation does not intend to waive any privilege.
- 3. Mozilla Foundation objects to each interrogatory and request to the extent that it calls for the disclosure of personally identifiable or other private information or materials about its current or former employees other than Plaintiff.
- 4. Mozilla Foundation objects to each interrogatory and request to the extent that it calls for the disclosure of its trade secrets or other proprietary, non-public information. To the extent that this information is discoverable, Mozilla Foundation will produce it if the Court issues a protective order reasonably restricting the use and disclosure of that information.

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- 5. Mozilla Foundation objects to each interrogatory and request to the extent that it calls for the production of electronically-stored information that is not readily accessible or for which the burden of retrieval is disproportionate to the potential relevancy of the information and its need in the case.
- 6. Mozilla Foundation objects to each interrogatory and request to the extent that it calls for information or items that are not presently in existence or under its custody or control.
- 7. Mozilla Foundation objects to each interrogatory and request to the extent that it calls for the production of information or items that are publicly available or otherwise readily accessible to Plaintiff and/or his counsel.

INTERROGATORIES

INTERROGATORY NO. 1: Identify the date, time, and individuals present at all meetings from May, 2022 to the present at which members of management or members of the Board of Directors discussed Plaintiff.

ANSWER: Mozilla Foundation objects to this Interrogatory on the grounds that it is overbroad, vague, and unduly burdensome. The interrogatory is not limited to the allegations or claims made in the Complaint. Mozilla Foundation further objects to the extent that this Interrogatory seeks attorney-client privileged communication. Subject to and without waiving these objections, Mozilla Foundation responds as follows:

At this time, Mozilla Foundation is unaware of any management team meeting concerning Plaintiff or the allegations asserted in the Complaint.

On May 24, 2023, Mozilla Foundation held its Annual General Meeting and Plaintiff was discussed in passing. Mozilla Foundation Board Members in attendance were Mitchell Baker, Mark Surman, Amy Keating, Brian Belhendorf, Helen Turvey, and Nicole Wong. All Board members may be contacted through Sebris Busto James. Also, in attendance at the May 24, 2023 meeting were Angela Plohman (Mozilla Foundation Chief Operation Officer and Secretary), Michael Durham (Mozilla Foundation outside counsel with the law firm Kirton McConkie). Ms. Plohman may be contacted through Sebris Busto James. Mozilla Corporation Board Members in attendance were Bob Lisbonne, Hugh Molotosi, Laura Chambers, Kerry Cooper, and Kristen Lund. All Mozilla Corporation Board Members may be contacted through DLA Piper.

SEBRIS BUSTO JAMES 15375 SE 30th Pl., Suite 310 Bellevue, Washington 98007 Tel: 425-454-4233 – Fax: 425-453-9005 1

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On August 9, 2023, Mozilla Foundation held a Board meeting and Plaintiff was briefly mentioned. Mozilla Foundation Board Members in attendance were Mitchell Baker, Mark Surman, Amy Keating, Brian Belhendorf, Helen Turvey, and Nicole Wong. All Board members may be contacted through Sebris Busto James. Also, in attendance at the August 9, 2023 meeting were Angela Plohman (Mozilla Foundation Chief Operation Officer and Secretary) and Michael Durham (Mozilla Foundation's outside counsel with the law firm Kirton McConkie). Ms. Plohman may be contacted through Sebris Busto James. Mozilla Corporation Board Members in attendance were Bob Lisbonne, Hugh Molotosi, Laura Chambers, Kerry Cooper, Karim Lakhani and Kristen Lund. All Mozilla Corporation Board Members may be contacted through DLA Piper. Anca van Assendelft with Seven Stones Consulting was also in attendance and may be contacted through DLA Piper.

Mozilla Foundation requested an extension to respond to this discovery request to provide a full and complete answer. Plaintiff declined to agree to the extension request, instead agreeing to a one-week extension despite the June 2025 deadline for discovery. As such, Mozilla Foundation reserves the right to supplement this Interrogatory response as more information becomes available during the discovery process.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: All Documents and Communications that

mention or relate to Plaintiff from May 1, 2022 to the present.

ANSWER: Mozilla Foundation objects that this Request is overbroad, vague, and unduly burdensome. The Request is not limited to the allegations or claims in the Complaint. Subject to and without waiving these objections, Mozilla Foundation responds as follows: please see documents bates stamped MozFoundation_00001 to MozFoundation 000013.

DEFENDANT MOZILLA FOUNDATION ANSWERS AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS – 4

Teixeira v. Mozilla Corporation, et al. – Case No. 2:24-cv-1032- RAJ

SEBRIS BUSTO JAMES 15375 SE 30th Pl., Suite 310 Bellevue, Washington 98007 Tel: 425-454-4233 – Fax: 425-453-9005

1	
2	Discovery is ongoing, and Mozilla Foundation reserves the right to supplement this Request for Production of Documents. Further responsive documents, if any, will
3	be produced through a rolling production.
4	DATED this 10th day of September 2024.
5	Sebris Busto James
6	s/ Darren A. Feider Darren A. Feider, WSBA #22430
7	15375 SE 30 th Pl., STE 310 Bellevue, Washington 98007
	(425) 454-4233
8	<u>dfeider@sbj.law</u>
9	SEBRIS BUSTO JAMES s/ Amanda V. Masters
10	Amanda V. Masters, WSBA #46342
11	15375 SE 30 th Pl., STE 310 Bellevue, Washington 98007
12	(425) 454-4233 amasters@sbj.law
13	Attorneys for Defendant Mozilla Foundation
14	
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1 VERIFICATION 2 Mark Surman, on behalf of Defendant Mozilla Foundation, states that he has read the 3 foregoing Answers to Plaintiff's First Set of Interrogatories and Requests for Production, knows 4 the contents thereof, that the same is true of their own knowledge, except as to matters therein 5 stated to be alleged upon information and belief, and as to those matters, they believe it to be true. 6 I declare under penalty of perjury under the laws of the State of Washington and the United 7 States that the foregoing is true and correct to the best of my knowledge. 9/11/2024 8 Dated this day September 2024. 9 Mark Surman 10 Name: Mark Surman Title: President 11 12 13 **ATTORNEY FRCP 26 CERTIFICATION** 14 The undersigned attorney for the Defendant Mozilla Foundation read the foregoing 15 Plaintiff's First Set of Interrogatories and Requests for Production of Documents and they are in 16 compliance with FRCP 26. 17 Dated this 10th day of September 2024. 18 By: 19 s/ Darren Feider 20 Darren Feider, WSBA# 22430 Attorney for Defendant Mozilla 21 Foundation 22 23 24

CERTIFICATE OF SERVICE

1

2	I, Darren A Feider, certify under penalty of perjury under the laws of the United States that		
3	on September 10, 2024, I caused to be served the attached document to the individuals listed below		
4	in the manner shown:		
5	Attorneys for Plaintiff:		
6	Mathew L. Harrington	☐ By U.S. Mail	
7	Amy K. Alexander STOKES LAWRENCE, P.S.	☐ By Federal Express☐ By Facsimile	
8	1420 5 th Avenue, 30 th Floor Seattle, WA 98101	☐ By Messenger☒ By Electronic Mail	
9	E-mail: mat.harrington@stokeslaw.com amy.alexander@stokeslaw.com	☐ By E-service	
10	Augustian Defendance Marilla Commention		
11	Attorneys for Defendants Mozilla Corporation Laura Chambers, Winifred Mitchell Baker, and Dani Chehak	<u>.</u>	
12	Anthony Todaro	☐ By U.S. Mail	
13	Alexandria Cates	☐ By Federal Express	
14	DLA PIPER LLP (US) 701 Fifth Avenue, Suite 6900	☐ By Facsimile☐ By Messenger	
	Seattle, WA 98104-7029	☑ By Messenger☑ By Electronic Mail	
15	E-mail: anthony.todaro@us.dlapiper.com alexandria.cates@us.dlapiper.com	☐ By E-service	
16			
17		s/ Darran A Faider	
18	s/ Darren A. Feider Attorney for Defendant		
19			
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DEFENDANT MOZILLA FOUNDATION ANSWERS AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS – 7

Teixeira v. Mozilla Corporation, et al. – Case No. 2:24-cv-1032- RAJ

SEBRIS BUSTO JAMES 15375 SE 30th Pl., Suite 310 Bellevue, Washington 98007 Tel: 425-454-4233 – Fax: 425-453-9005 From: <u>Cates, Alexandria</u>

To: <u>Maricarmen Perez-Vargas</u>; <u>Beth Touschner</u>

Cc: Mathew Harrington; Sarah Armon; Laura Smith; Anna Armitage; Charlotte Edwards; Bittle, Jacey; McFadden,

Robert; Todaro, Anthony; Katie Marchenko; Amy K. Alexander; Darren Feider

Subject: RE: Activity in Case 2:24-cv-01032-RAJ Teixeira v. Mozilla Corporation et al Order on Stipulated Motion

Date: Thursday, April 3, 2025 8:53:52 AM

Attachments: <u>image001.png</u>

Hi Maricarmen,

Defendants do not agree to move the expert disclosure deadline.

Thanks,

Alex

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797

M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Maricarmen Perez-Vargas < Maricarmen. Perez-Vargas@stokeslaw.com>

Sent: Tuesday, April 1, 2025 12:57 PM

To: Beth Touschner <btouschner@sbj.law>; Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>

Cc: Mathew Harrington < Mathew. Harrington@stokeslaw.com>; Sarah Armon

<sarah.armon@stokeslaw.com>; Laura Smith < Laura.Smith@stokeslaw.com>; Anna Armitage
<Anna.Armitage@stokeslaw.com>; Charlotte Edwards < charlotte.edwards@stokeslaw.com>; Bittle,
Jacey < Jacey.Bittle@us.dlapiper.com>; McFadden, Robert < robert.mcfadden@us.dlapiper.com>;
Todaro, Anthony < Anthony.Todaro@us.dlapiper.com>; Katie Marchenko < kmarchenko@sbj.law>;
Amy K. Alexander < Amy.Alexander@stokeslaw.com>; Darren Feider < dfeider@sbj.law>

Subject: RE: Activity in Case 2:24-cv-01032-RAJ Teixeira v. Mozilla Corporation et al Order on Stipulated Motion

A EXTERNAL MESSAGE

Alex,

We cannot stipulate to a continuance that requires such a delayed trial date. Since the Court has instructed that a date in 2025 is not available, our preference is to move forward with the current schedule. We are, however, amenable to moving **only** the expert disclosure deadline.

If defendants move to continue the trial date and associate deadlines, please be advised we will oppose that motion.

Please also be advised that in light of Judge Jones' denial of our stipulated joint motion, we will not be able to grant any extensions to Mozilla Corporation's and Individual Defendants' deadline to respond to Plaintiff's joint LCR 37 motion, which is this Friday.

Maricarmen Perez-Vargas

Attorney

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2125 | Office: 206.626.6000

<u>Maricarmen.Perez-Vargas@stokeslaw.com</u> | <u>stokeslaw.com</u>

This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: Beth Touschner < btouschner@sbj.law>

Sent: Friday, March 28, 2025 11:06 AM

To: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Maricarmen Perez-Vargas

<Maricarmen.Perez-Vargas@stokeslaw.com>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Sarah Armon

<sarah.armon@stokeslaw.com>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage

<<u>Anna.Armitage@stokeslaw.com</u>>; Charlotte Edwards <<u>charlotte.edwards@stokeslaw.com</u>>; Bittle,

Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>;

Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbi.law</u>>;

Amy K. Alexander <u>Amy.Alexander@stokeslaw.com</u>; Darren Feider <<u>dfeider@sbj.law</u>>

Subject: RE: Activity in Case 2:24-cv-01032-RAJ Teixeira v. Mozilla Corporation et al Order on Stipulated Motion

Thanks, Alex. I just have a few minor changes to 2:2-4:

The Order set expert discovery deadlines for April 9, 2025. The deadline to file all all related to discovery is was set for to May 5, 2025.

Other than that, it looks good to me. Thanks so much.

Best regards,

Beth Touschner

Beth Touschner, Senior Attorney
Sebris Busto James
a Best Lawyers® regional Tier 1 firm

T: (425) 460-2295 | F: (425) 453-9005



E: <u>btouschner@sbj.law</u> | <u>sbj.law</u>

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

This email is confidential and may be privileged and protected from disclosure. Please notify me at btouschner@sbi.law if you have received this email in error.

From: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>

Sent: Friday, March 28, 2025 10:12 AM

To: Maricarmen Perez-Vargas < <u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Beth Touschner < <u>btouschner@sbi.law</u>>

Cc: Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Sarah Armon

<sarah.armon@stokeslaw.com>; Laura Smith ".aura Smith ".aura Smith ".

Subject: FW: Activity in Case 2:24-cv-01032-RAJ Teixeira v. Mozilla Corporation et al Order on Stipulated Motion

[WARNING: From EXTERNAL Sender] Hi All.

Please see the attached revised stipulated motion. We added additional facts in track changes. Let us know if you have any edits.

Thank you,

Alex

Alex Cates

Associate

T +1 206 839 4893

F +1 206 494 1797

M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: ECF@wawd.uscourts.gov>

Sent: Thursday, March 27, 2025 2:31 PM

To: ECF@wawd.uscourts.gov

Subject: Activity in Case 2:24-cv-01032-RAJ Teixeira v. Mozilla Corporation et al Order on Stipulated

Motion

EXTERNAL MESSAGE

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U.S. District Court

United States District Court for the Western District of Washington

Notice of Electronic Filing

The following transaction was entered on 3/27/2025 at 2:30 PM PDT and filed on 3/27/2025

Case Name: Teixeira v. Mozilla Corporation et al

Case Number: <u>2:24-cv-01032-RAJ</u>

Filer:

Document Number: 25

Docket Text:

MINUTE ORDER denying [24] Stipulated MOTION to Amend the Case Schedule. The motion is denied without prejudice to being refiled with additional information to establish good cause. Authorized by Judge Richard A. Jones. (VE)

2:24-cv-01032-RAJ Notice has been electronically mailed to:

Darren Anthony Feider <u>dfeider@sbi.law</u>, <u>epruzinsky@sbi.law</u>, <u>kmarchenko@sbi.law</u>

Anthony Todaro <u>anthony.todaro@us.dlapiper.com</u>, <u>anthony-todaro-6908@ecf.pacerpro.com</u>, <u>jacey.bittle@us.dlapiper.com</u>

Mathew L Harrington <u>mathew.harrington@stokeslaw.com</u>, <u>LAS@stokeslaw.com</u>

Elizabeth S Touschner <u>btouschner@sbj.law</u>, <u>epruzinsky@sbj.law</u>, <u>kmarchenko@sbj.law</u>

Amy J Alexander <u>amy.alexander@stokeslaw.com</u>, <u>axa@stokeslaw.com</u>, <u>sarah.armon@stokeslaw.com</u>

Alexandria Anne Cates <u>alexandria.cates@us.dlapiper.com</u>, jacev.bittle@us.dlapiper.com

Maricarmen Perez-Vargas <u>maricarmen.perez-vargas@stokeslaw.com</u>, anna.armitage@stokeslaw.com

2:24-cv-01032-RAJ Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=3/27/2025] [FileNumber=10268103-0] [bd8bfc3010eda9d6c46b20d6c4e5e3418674f3a1c61556bfcfd86189390ed4acfe ed34ad4c22a82695b618f241f108a9d8f248e397c2cb416d228c7ef5f767b1]]

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From: <u>Todaro, Anthony</u>

To: <u>Mathew Harrington</u>; <u>Amy K. Alexander</u>

Cc: Cates, Alexandria; Igbokwe, Danielle; Maricarmen Perez-Vargas; Sarah Armon; Anna Armitage; Laura Smith

Subject: RE: Steve Teixeira v. Mozilla Corporation - Case Schedule Extension Issue

Date: Thursday, April 24, 2025 10:47:26 AM

Attachments: <u>image001.png</u>

Thanks, Mat. Not sure we can use that process in this setting. Appreciate the flexibility, though.

From: Mathew Harrington < Mathew. Harrington@stokeslaw.com>

Sent: Thursday, April 24, 2025 10:37 AM

To: Todaro, Anthony < Anthony. Todaro@us.dlapiper.com>; Amy K. Alexander

<Amy.Alexander@stokeslaw.com>

Cc: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Igbokwe, Danielle

<danielle.igbokwe@us.dlapiper.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-</pre>

Vargas@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Anna Armitage

<Anna.Armitage@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>

Subject: RE: Steve Teixeira v. Mozilla Corporation - Case Schedule Extension Issue

A EXTERNAL MESSAGE

Anthony,

You are correct. We are at impasse despite diligent efforts to resolve this difference.

We are also amenable to using the LCR 37 procedure again if you wish, but that's up to you of course.

Regards,

Mat

Mathew Harrington

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2135 | Office: 206.626.6000

<u>Mathew.Harrington@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Todaro, Anthony < <u>Anthony.Todaro@us.dlapiper.com</u>>

Sent: Thursday, April 24, 2025 10:26 AM

To: Amy K. Alexander < <u>Amy.Alexander@stokeslaw.com</u>>

Cc: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Igbokwe, Danielle

<danielle.igbokwe@us.dlapiper.com; Maricarmen Perez-Vargas Maricarmen.Perez-Vargas@stokeslaw.com; Mathew Harrington Maricarmen.Perez-Vargas <a href="mailto:Maricarmen.Perez-Vargas <a href="mailto:Maricarmen.Perez-Vargas <a href="mailto:Maricarmen.Perez-Vargas <a href="mailto:Maricarmen.Perez

Subject: RE: Steve Teixeira v. Mozilla Corporation - Case Schedule Extension Issue

Thanks, Amy, we do intend to file a motion (likely tomorrow). I assume this means we don't need a further meet and confer, but please let me know if you disagree.

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Wednesday, April 23, 2025 9:33 AM

To: Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>

Cc: Cates, Alexandria < <u>Alexandria.Cates@us.dlapiper.com</u>>; Igbokwe, Danielle

<<u>danielle.igbokwe@us.dlapiper.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-</u>

<u>Vargas@stokeslaw.com</u>>; Mathew Harrington < <u>Mathew.Harrington@stokeslaw.com</u>>; Sarah Armon

<<u>sarah.armon@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Laura Smith

<Laura.Smith@stokeslaw.com>

Subject: RE: Steve Teixeira v. Mozilla Corporation - Case Schedule Extension Issue

EXTERNAL MESSAGE

Hello Anthony,

Thanks for your message. We understand the concerns you outline below. As explained below, we do not feel it is in our client's interest to delay trial into 2026, so we cannot agree to stipulate to a continuance.

First and foremost, we already have a long trial schedule, with the court setting a trial schedule over one year long (longer than either of us requested). I'm surprised that you are suggesting up to a 120 day delay in the trial schedule, after having waited nearly one month following the Court's denial of the stipulated motion to amend the case schedule. It also comes after Mozilla refused to adjust the expert witness disclosure deadline following the Court's denial of the stipulated motion to amend the case schedule (and then did not disclose any expert witnesses). Cynically, Mozilla is taking a dilatory approach to this cancer discrimination case. The cadence of this renewed continuance request effectively denied Plaintiff the benefit of additional time for expert witness disclosure (as requested), and compounds the potential delay in this case given the Court's requirement for a minimum 90 day continuance.

Second, Defendants clearly dragged their feet on discovery, and now are citing discovery as the reason for a need to continue the case. We were attempting to work diligently with Mozilla in the fall of 2024 on search terms and custodians, and there was no need for Mozilla to wait for a deficiency letter to proceed with its discovery obligations.

Third, we have been extremely diligent and flexible in setting depositions, which we kicked off two weeks ago. It is Mozilla that requested to push Mr. Teixeira's deposition past the discovery cutoff – we had provided availability for him before the discovery cutoff. There are no other depositions scheduled for after the cutoff, and Mozilla has provided no specific information about 30(b)(6) designees that would persuade us that those depositions need to occur in late June or July.

We understand that this means you will seek relief from the Court on this issue.

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Todaro, Anthony < <u>Anthony.Todaro@us.dlapiper.com</u>>

Sent: Monday, April 21, 2025 5:21 PM

To: Amy K. Alexander Amy K. Alexander Amy K. Alexander Amy.Alexander@stokeslaw.com; Maricarmen Perez-Vargas

<<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>

Cc: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Igbokwe, Danielle

<danielle.igbokwe@us.dlapiper.com>

Subject: Steve Teixeira v. Mozilla Corporation - Case Schedule Extension Issue

Amy and Maricarmen –

As I mentioned during our discovery meeting earlier today, we do not believe we can get all that the parties need to get done on the current case schedule timeline. I asked that you consider an agreement to push timelines roughly 90-120 and agree to the Court's first-available new trial date in early 2026. As you know, we are working under the original trial date, and I don't believe it can be reasonably argued that the parties have not worked in good faith to keep things moving forward.

To begin with, notwithstanding that Defendants provided responses to discovery in early September, we did not hear from Plaintiff about any alleged discovery deficiencies until January. The parties worked through those issues for the better part of two months, and it was just last month that we had our first discovery motion filed. Now, we are in the process of working through a second LCR 37 discovery motion to be filed later this month. Finally, it sounds like there may be a third motion filed next month, based on your email from earlier today.

All of this also comes with Plaintiff having served a second and now a third set of discovery, the latter of which does not even come due until just before the planned deposition period. That period, incidentally, already reaches beyond the Court deadline with depositions set after cutoff and several more still unset.

As far as document discovery is concerned, we have made two multi-thousand page productions, and we expect to make more through the May 9 date we discussed – but that date does not account for new searches that may be needed in light of the second and now third discovery requests. We also only received the 19-topic corporate deposition notice at the end of last week. Getting witnesses lined up for that, particularly in light of the various outstanding discovery items, the various discovery motions, and the cramped deposition dates that already stretch beyond the cutoff, is going to be extremely difficult and will almost certainly need to carry into late June or July. Defendants, too, may need to notice additional depositions once we receive the promised discovery supplementations from Plaintiff (which we still don't have) and get rulings (and possibly productions) on medical records.

Both parties also have indicated that they intend to file summary judgment, but we will not be in a position to get transcripts, even if we complete depositions (which is uncertain), in time for the early July deadline for filing.

All in all, the timeline is too cramped for what we have in store. Please let us know if you would be willing to negotiate a revised case schedule that takes advantage of the Court's first-available trial date in 2026. If not, please let us know if a further meet-and-confer is needed, as it is our intention to make a motion with the Court.

Best, Anthony

Anthony Todaro

Partner

T +1 206 839 4830 F +1 206 494 1802

M +1 206 949 3395

anthony.todaro@us.dlapiper.com

DLA Piper LLP (US) 701 Fifth Avenue

Suite 6900

Seattle, WA 98104-7044



dlapiper.com

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From: Amy K. Alexander

To: Cates, Alexandria; Beth Touschner

Cc: Mathew Harrington; Maricarmen Perez-Vargas; Darren Feider; Sarah Armon; Laura Smith; Anna Armitage; Bittle, Jacey; Todaro, Anthony; McFadden, Robert; Katie Marchenko; TDo@mcnaul.com; DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

Date: Thursday, April 17, 2025 4:32:46 PM

Attachments: <u>image001.png</u>

Hello Alex.

Ms. McLean's June availability is June 11 (after 12pm); June 13; and June 20 (after 11am). She is not available June 16 or 17.

Please provide Ms. Shepard's availability for a deposition.

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 Amy.Alexander@stokeslaw.com | stokeslaw.com

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From: Cates, Alexandria < Alexandria. Cates@us.dlapiper.com>

Sent: Thursday, April 17, 2025 9:22 AM

To: Amy K. Alexander < Amy. Alexander@stokeslaw.com>; Beth Touschner < btouschner@sbj.law>

Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Katie Marchenko <kmarchenko@sbj.law>; TDo@mcnaul.com;

DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

Hi Amy,

- Can we stipulate to holding Lisa's deposition June 16th or 17th?
- Bob is available in the afternoon of May 28th
- I should have an update on Lindsey shortly.

Alex Cates

Associate

T +1 206 839 4893 F +1 206 494 1797 M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com >

Sent: Wednesday, April 16, 2025 3:59 PM

To: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Beth Touschner <<u>btouschner@sbj.law</u>>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; TDo@mcnaul.com; DWeiskopf@mcnaul.com; DWeiskopf@mcnaul.com;

Subject: RE: Teixeira/Mozilla - deposition notices

EXTERNAL MESSAGE

Hello,

More deposition scheduling:

• Lia McLean. Here are the dates that will work for her and for us. There is also availability the week of June 9 (but not on June 9) if you

would like me to provide that.

- o May 16 after 1pm
- o May 19 1-4pm
- o June 4 after 2pm
- Kerry and Hugh. We will send updated notices for Kerry and Hugh for 6/5.
- Lindsey and Bob. Alex, we served dep notices over a week ago. On Monday you stated that you would provide availability on
 Tuesday. It is now Wednesday. I'm concerned that these witnesses are not making themselves available. Please provide availability
 no later than EOD tomorrow.

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Amy K. Alexander

Sent: Monday, April 14, 2025 4:26 PM

To: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Beth Touschner <<u>btouschner@sbj.law</u>>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; TDo@mcnaul.com;

DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

Hello,

More deposition scheduling items:

- Mr. Teixeira is available for his deposition on June 12, 2025. We expect that all parties will complete their questioning on the same
- Ms. McLean's availability is challenging, and we are asking for additional available dates and will get back to you. Again, we expect
 that any party that wishes to depose Ms. McLean will do so on the same date.
- Any update on Lindsey, Hugh, Kerry, and Bob's availability?

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Amy K. Alexander

Sent: Friday, April 11, 2025 4:05 PM

To: Cates, Alexandria < Alexandria. Cates@us.dlapiper.com >; Beth Touschner < btouschner@sbj.law >

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; TDo@mcnaul.com;

DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

Alex and Beth – thank you for the update. I am checking with Mr. Teixeira about his availability following the discovery cutoff, and will get back to you.

Beth - I will check Ms. McLean's availability.

Alex - Please let me know about Lindsey, Hugh, Kerry, and (I think you meant) Bob's availability.

Dan – Welcome to the case, and please let me know if Ms. Baker is agreeable to deposing Mr. Teixeira following the discovery cutoff.

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Cates, Alexandria < Alexandria. Cates@us.dlapiper.com >

Sent: Friday, April 11, 2025 10:48 AM

To: Beth Touschner < btouschner@sbj.law>; Amy K. Alexander < Amy.Alexander@stokeslaw.com>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; <u>TDo@mcnaul.com</u>; DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

Mozilla Corporation would also agree to stipulate to hold Steve's deposition the week of June 9th, based on the assertion that he is unavailable the first week of June/June 9th, and the fact that Darren will be unavailable May 19-30th.

We have the dates for Laura and Dani held. We are still working on confirmation for Lindsey, Mark, Hugh and Kerry. We will not have confirmation on their availability by the end of the day today, but will have it by early next week. Initially, however, it is looking like the last week of May (May 26-30) is going to work best for those depositions.

Alex Cates

Associate

T +1 206 839 4893

F +1 206 494 1797 M +1 425 275 6289

alexandria.cates@us.dlapiper.com

DLA Piper LLP (US) dlapiper.com

From: Beth Touschner < btouschner@sbj.law>

Sent: Friday, April 11, 2025 10:36 AM

 $\textbf{To:} \ \, \text{Amy K. Alexander} \, \underbrace{\text{Amy.Alexander@stokeslaw.com}}; \ \, \text{Cates, Alexandria} \, \underbrace{\text{Alexandria.Cates@us.dlapiper.com}} \\$

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony.Todaro@us.dlapiper.com>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; <u>TDo@mcnaul.com</u>;

DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

A EXTERNAL MESSAGE

Amy,

We can confirm that day for Mr. Surman. We'd like to start looking at dates for Mr. Teixeira's deposition. Darren is unavailable May 19-30 and you mentioned Steve is not available between June 2-9. Will Plaintiff stipulate to holding Steve's deposition the week of June 9^{th} – either June 11^{th} or 12^{th} ?

We'd also like to schedule the deposition of Liliya McLean. Please let us know her availability for a deposition on June 3 or 6. Please check on both in person and virtual availability.

Best regards,

Beth Touschner



Beth Touschner, Senior Attorney

Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 460-2295 | F: (425) 453-9005

E: btouschner@sbj.law | sbj.law

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

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From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Thursday, April 10, 2025 4:21 PM

To: Beth Touschner < btouschner@sbj.law>; Cates, Alexandria < Alexandria.Cates@us.dlapiper.com>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>; TDo@mcnaul.com; DWeiskopf@mcnaul.com

Subject: RE: Teixeira/Mozilla - deposition notices

[WARNING: From EXTERNAL Sender]

Hello all,

Beth – I appreciate the clarification. Alex - Thank you for hosting the depositions at the DLA Piper offices in San Francisco. Below is an updated deposition schedule given what I have heard about Mr. Surman, Ms. Chambers, and Ms. Chehak's availability. Please let me know by end of day tomorrow if this will not work for the witnesses.

Laura Chambers	Defendant	5/21/25	SF
Dani Chehak	Defendant	5/22/25	SF
Lindsey O'Brian	Witness	5/19/25 8:30am	Remote
Mark Surman	Witness	5/13/25 9:00am	Remote
Hugh Molotsi	Witness	5/19/25 1:00pm	Remote
Kerry Copper	Witness	5/20/25 8:30am	Remote
Bob Lisbonne	Witness	5/20/25 1:00pm	Remote
Winifred Mitchell Baker	Defendant	5/23/25	SF

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Beth Touschner < btouschner@sbj.law>

Sent: Thursday, April 10, 2025 3:47 PM

To: Amy K. Alexander <<u>Amy.Alexander@stokeslaw.com</u>>; Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>;

 $\label{lem:mcfadden} $$McFadden, Robert < $$ $$ compared a marchenko < $$ $$ marchenko@sbj.law >; $$ $$ DWeiskopf@mcnaul.com $$$

Subject: RE: Teixeira/Mozilla - deposition notices

Hello again,

I'm adding in Mr. Weiskopf and Ms. Do to this email as I inadvertently left them off the prior emails. It turns out that May 8th will not work for us. However, we can be available May 6th between 7:00-9:30 AM and 12:00-4:00 PM.

Best regards,

Beth Touschner



Beth Touschner, Senior Attorney

Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 460-2295 | F: (425) 453-9005

E: <u>btouschner@sbj.law</u> | <u>sbj.law</u>

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

From: Beth Touschner

Sent: Thursday, April 10, 2025 3:16 PM

To: Amy K. Alexander Amy.Alexander@stokeslaw.com; Cates, Alexandria Alexandria.Cates@us.dlapiper.com

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: RE: Teixeira/Mozilla - deposition notices

Hi Amy,

I'm sorry – I should have mentioned this in my last email. Mr. Surman is not available between May 19-June 12. He is available, however, May 8 between 11 AM and 6 PM PT. Please let me know if that works.

Best regards,

Beth Touschner



Beth Touschner, Senior Attorney

Sebris Busto James

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E: <u>btouschner@sbj.law</u> | <u>sbj.law</u>

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

This email is confidential and may be privileged and protected from disclosure. Please notify me at btouschner@sbi.law if you have received this email in error.

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Thursday, April 10, 2025 2:44 PM

To: Beth Touschner < btouschner@sbj.law; Cates, Alexandria < Alexandria.Cates@us.dlapiper.com

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: RE: Teixeira/Mozilla - deposition notices

[WARNING: From EXTERNAL Sender] Hi Beth,

Thank you for working with us, but I'd ask for additional flexibility from the Foundation given the very short timeline. I'm hearing that you are now available on May 21, but I haven't heard that Mr. Surman *isn't* available on that date. May 12-14 are not possible for our team.

Please check in on Mr. Surman's availability on May 21, as reflected in our notice of deposition.

Thanks.

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

This message may be confidential and legally privileged. If you received this message in error, please inform the sender and then delete it.

From: Beth Touschner < btouschner@sbi.law>

Sent: Thursday, April 10, 2025 2:27 PM

To: Amy K. Alexander Alexandria Alexandria.Cates@us.dlapiper.com

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: RE: Teixeira/Mozilla - deposition notices

Hi Amy,

I was able to switch some things around so that I can be available on May 21st. Darren will not be available then, but the Foundation is okay with scheduling depositions for that day if needed.

Mark Surman, Darren, and I are available for Mr. Surman's deposition on the following times:

- May 12: 1-6 PM PT
- May 13: 8:30 AM 12:30 PM PT
- May 14: 11:00 AM 6 PM PT

Mr. Surman is holding these dates for now but the sooner we can finalize the date and time, the better.

Best regards,

Beth Touschner

Beth Touschner, Senior Attorney



Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 460-2295 | F: (425) 453-9005

E: btouschner@sbj.law | sbj.law

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

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From: Amy K. Alexander < Amy. Alexander@stokeslaw.com>

Sent: Thursday, April 10, 2025 1:10 PM

To: Beth Touschner < btouschner@sbj.law; Cates, Alexandria < Alexandria.Cates@us.dlapiper.com

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: RE: Teixeira/Mozilla - deposition notices

[WARNING: From EXTERNAL Sender] Hello Beth,

Please provide an update on Mr. Surman's availability. Also, please confirm that you do not object to other depositions being held on the May 21.

Thanks!

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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From: Beth Touschner < btouschner@sbj.law>

Sent: Tuesday, April 8, 2025 9:08 AM

To: Amy K. Alexander <<u>Amy.Alexander@stokeslaw.com</u>>; Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: RE: Teixeira/Mozilla - deposition notices

Thanks, Amy. Unfortunately, Darren and I are not available on May 21st for Mr. Surman's deposition. We are checking his schedule against ours and will propose alternative dates as soon as we have them.

Best regards,

Beth Touschner

?

Beth Touschner, Senior Attorney



Sebris Busto James

a *Best Lawyers*® regional Tier 1 firm T: (425) 460-2295 | F: (425) 453-9005

E: btouschner@sbj.law | sbj.law

15375 SE 30th Pl., Suite 310 | Bellevue, Washington 98007

From: Amy K. Alexander < Amy. Alexander@stokeslaw.com >

Sent: Monday, April 7, 2025 2:21 PM

To: Cates, Alexandria <<u>Alexandria.Cates@us.dlapiper.com</u>>; Beth Touschner <<u>btouschner@sbj.law</u>>

Cc: Mathew Harrington <<u>Mathew.Harrington@stokeslaw.com</u>>; Maricarmen Perez-Vargas <<u>Maricarmen.Perez-Vargas@stokeslaw.com</u>>; Darren Feider <<u>dfeider@sbj.law</u>>; Sarah Armon <<u>sarah.armon@stokeslaw.com</u>>; Laura Smith <<u>Laura.Smith@stokeslaw.com</u>>; Anna Armitage <<u>Anna.Armitage@stokeslaw.com</u>>; Bittle, Jacey <<u>Jacey.Bittle@us.dlapiper.com</u>>; Todaro, Anthony <<u>Anthony.Todaro@us.dlapiper.com</u>>; McFadden, Robert <<u>robert.mcfadden@us.dlapiper.com</u>>; Katie Marchenko <<u>kmarchenko@sbj.law</u>>

Subject: Teixeira/Mozilla - deposition notices

[WARNING: From EXTERNAL Sender]

Hello Alex and Beth,

Shortly, you will receive a number of deposition notices and subpoenas for the following individuals:

- Mozilla Corp:
 - Laura Chambers
 - o Mitchell Baker
 - o Dani Chehak
 - Kerry Cooper
 - Hugh Molotsi
 - o Linsey Shepard O'Brien
 - Bob Lisbonne
- Mozilla Foundation:
 - o Marc Surman

Here is the schedule for the depositions:

Deponent	Date	Location
Laura Chambers	5/19/25	SF
	8:30am	
Dani Chehak	5/20/25	SF
	8:30am	
Lindsey O'Brian	5/21/25	Remote
	8:30am	
Mark Surman	5/21/25	Remote
	1:30pm	
Hugh Molosti	5/22/25	Remote
	8:30am	
Kerry Copper	5/22/25	Remote
	11:30am	
Bob Lisbonne	5/22/25	Remote
	2:30pm	
Winifred Mitchell Baker	5/23/25	SF
	8:30am	

In addition, please expect a 30(b)(6) notice. We will be taking Laura, Mitchell, and Dani's depositions in person, and listed DLA Piper's San Francisco office as the proposed location. Please let us know as soon as possible whether another office is preferred, or if DLA Piper declines to host these depositions in its offices. We intend for the remaining depositions to be remote. Given the upcoming discovery cutoff, we have included dates, but are willing to shuffle these a bit to accommodate witness availability.

While Mozilla Corporation has indicated for several days that Ms. Baker is seeking new counsel, none has yet appeared and DLA Piper remains the attorney of record in this matter. Therefore, we anticipate your cooperation in this matter.

I imagine that you will be looking to depose Steve soon. Please note that Mr. Teixeira's son is getting married in early June. He will not be available for a deposition the entire first week of June 9.

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

Direct: 206.892.2161 | Office: 206.626.6000 <u>Amy.Alexander@stokeslaw.com</u> | <u>stokeslaw.com</u>

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The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. To contact us directly, send to postmatter@dlapiper.com. Thank you.

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Case No. 2:24-cv-1032

SECOND SET OF

DEFENDANT WINIFRED MITCHELL BAKER'S

INTERROGATORIES AND

OBJECTIONS TO PLAINTIFF'S

REQUEST FOR PRODUCTION

STEVE TEIXEIRA,

Plaintiff,

V.
MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California public benefit corporation; LAURA CHAMBERS and her marital community; WINIFRED MITCHELL BAKER and her marital community, and DANI CHEHAK and her marital community.

Defendants.

Plaintiff Steve Teixeira

AND TO: Plaintiff's Counsel of Record

Defendant Winifred Mitchell Baker ("Defendant"), by and through their counsel of record, hereby objects to Plaintiff Steve Teixeira ("Plaintiff") Second Set of Interrogatories and Requests for Production to Defendant Winifred Mitchell Baker as follows:

GENERAL OBJECTIONS AND DEFINITIONS

The following General Objections shall be considered as made, to the extent applicable, in response to each of the Interrogatories and Requests, as if the General Objections were fully set forth in each such response, including those responses which also set forth specific objections.

1. Defendant objects to each Interrogatory and Request to the extent that it seeks to impose obligations beyond those set forth by the Federal Rules of Civil Procedure.

DEFENDANT WINIFRED MITCHELL BAKER'S OBJECTIONS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION - 1

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DEFENDAN
OBJECTION

- 2. Defendant objects to each Interrogatory and Request to the extent that it calls for the production of documents or information containing trade secrets, proprietary information, confidential information and other competitively sensitive business or commercial information.
- 3. Defendant objects to each Interrogatory and Request to the extent that it seeks privileged documents or privileged information, including, without limitation, documents or information that were prepared, generated, or received for or in anticipation of litigation, documents or information that constitute attorney work product, or documents or information that is protected by a claim of privilege or immunity, including, without limitation, the attorney-client privilege, common interest or joint defense privilege, or any other applicable privilege or immunity. Such documents or information shall not be provided in response hereto, and inadvertent disclosure shall not be deemed a waiver of any privilege, immunity or protection.
- 4. Defendant objects to each Interrogatory and Request to the extent it is vague, ambiguous, compound, or does not describe the information sought with sufficient particularity.
- 5. Defendant's responses to Plaintiff's Interrogatories and Requests are based on information presently available to Defendant. Defendant reserves the right to supplement and/or amend these responses or to supply additional documents at a later time, if further information becomes available in the course of Defendant's diligent inquiries, through discovery or otherwise. These responses should not be construed as, and do not constitute a waiver of, Defendant's rights to prove additional facts at trial.
- 6. Defendant objects to each Interrogatory and Request to the extent it is unduly burdensome, oppressive, or harassing.
- 7. Defendant objects to each Interrogatory and Request to the extent that it is overly broad and not limited in time or scope.
- 8. To the extent that Defendant states that it will identify or produce documents responsive to the Requests, this is an indication that Defendant has used reasonable diligence to locate the requested documents it believes, in the exercise of reasonable business and technological

usage, are relevant, responsive, and non-privileged. To the extent Plaintiff required Defendant to do more than the foregoing, Defendant objects to each and every Request on the ground that it would subject Defendant to oppression, harassment, and undue burden.

ANSWER TO INTERROGATORIES

INTERROGATORY NO. 2: Identify all accounts that you have used in the last five years including, but not limited to, email addresses, social media, phone numbers, blogs, messaging applications (e.g., Signal, Telegram, or Snapchat, or other similar applications and accounts).

ANSWER TO INTERROGATORY NO. 2:

Defendant objects to this Interrogatory on the grounds that it overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Defendant also objects to this Interrogatory on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy.

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RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 2: Produce any documents and communications discussing the TK Law report or assessment.

RESPONSE TO REQUEST NO. 2:

Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, documents and/or communications that merely mention

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the TK Law report or assessment are over encompassing and will not necessarily relate to the relevant claims or defenses at issue in this case.

REQUEST FOR PRODUCTION NO. 3: Produce all documents from January 2022 to the present related to or regarding the hiring, transition, succession, or removal of individuals as Mozilla CEO.

RESPONSE TO REQUEST NO. 3:

Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, "all documents" related to the hiring, transition, succession, or removal of individuals as Mozilla CEO from January 2022 to the present are over encompassing and will not necessarily relate to claims or defenses. Defendant also objects to this Request on the grounds that it violates the individual right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Defendant also objects on the basis that Mozilla has taken the position that the TK Law Report is privileged, and therefore Defendant is not individually at liberty to disclose in any event.

Dated this 2nd day of April, 2025

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DLA PIPER LLP (US)

By: s/ Anthony Todaro

Anthony Todaro, WSBA No. 30391

s/ Alexandria Cates

Alexandria Cates, WSBA No. 53786 701 Fifth Avenue, Suite 6900 Seattle, Washington 98104-7029

Tel: 206.839.4800

E-mail: anthony.todaro@us.dlapiper.com
E-mail: alexandria.cates@us.dlapiper.com

Attorneys for Defendants MOZILLA CORPORATION a.k.a M.F. TECHNOLOGIES, LAURA CHAMBERS, WINIFRED MITCHELL BAKER, and DANI CHEHAK

DEFENDANT WINIFRED MITCHELL BAKER'S OBJECTIONS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION - 5

CERTIFICATION

The undersigned attorneys for Defendant Winifred Mitchell Baker have read the foregoing Second Set of Interrogatories and Requests for Production, and Defendant's answers and responses thereto, and states that they are in compliance with applicable Federal Rules of Civil Procedure and the Local Rules of the Western District of Washington, this 2nd day of April, 2025.

s/ Anthony Todaro

Anthony Todaro, WSBA No 30391 Alexandria Cates, WSBA No. 53789 Attorneys for Defendants Mozilla Corporation, Laura Chambers, Winifred Michell Baker, and Dani Chehak

DEFENDANT WINIFRED MITCHELL BAKER'S OBJECTIONS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION - 6

CERTIFICATE OF SERVICE

1				
2	I hereby certify that on April 2, 2025, I cause	sed a tı	rue and correct copy of the fore	egoing
3	document to be served on the parties listed below in	the ma	nner indicated:	
4	Amy Alexander		Via Hand Delivery	
5	Mathew Harrington STOKES LAWRENCE, P.S.		Via U.S. Mail	
6	1420 Fifth Avenue, Suite 3000 Seattle, WA 98101-2393	\boxtimes	Via E-mail	
7	Telephone: (206) 626-6000 Fax: (206) 464-1496		Via the Court's	
8	Amy.alexander@stokeslaw.com Mathew.Harrington@stokeslaw.com		E-Service Device	
9	laura.smith@stokeslaw.com sarah.armon@stokeslaw.com Maria arma an Paraga Vargas@stolkaslaw.gara			
10	Maricarmen.Perez-Vargas@stokeslaw.com anna.armitage@stokeslaw.com			
11	Attorneys for Plaintiff Steve Teixeira			
2	Darren A. Feider Amanda V. Masters		Via Hand Delivery	
3	SEBRIS BUSTO JAMES 15375 SE 30th Pl., STE 310		Via U.S. Mail	
4	Bellevue, Washington 98007 dfeider@sbj.law	\boxtimes	Via E-mail	
15	amasters@sbj.law epruzinsky@sbj.law		Via the Court's E-Service Device	
16	kmarchenko@sbj.law			
7	Attorneys for Defendant Mozilla Foundation			
.8	I declare under penalty of perjury under the la	aws of	the state of Washington that the	;
9	foregoing is true and correct.			
20	Dated this 2 nd day of April, 2025			
21	s/Jac	ey Bitti	le Legal Executive Assistant	
22	Jacey	Bittle,	Legal Executive Assistant	
23				
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DEFENDANT WINIFRED MITCHELL BAKER'S OBJECTIONS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION - 7